



**Mid-Devon Local Plan Review Options/Consultation
Representations Made on Behalf of the Turner Family by Jackson-Stops & Staff
March 2014**

Draft Policy S3 – Amount and Distribution of Development

Draft Policy S3 identifies the need for 8,400 dwellings and 154,000 square metres of commercial development to be provided across the Plan period from 2013 to 2033. There are two options put forward for distributing this growth.

Observations on Draft Policy S3

We note the proposed level of growth of 8,400 homes is not based on any up to date empirical evidence and appears simply to be an extrapolation of growth rates established under the existing Development Plan.

We understand that Mid Devon District Council are currently preparing a revised Strategic Housing Market Assessment and that once published this may well identify a need for a higher level of growth than the level currently identified. As a result, this will place yet more emphasis on the need to make the most of currently identified and otherwise suitable sites to ensure the required level of growth is brought forward.

As part of Draft Policy S3 it is proposed that sites providing for a total of 800 dwellings need to be identified within Crediton, but that there are outstanding Allocations for a total of 298 homes in the town. We understand that the Pedlerspool site is not included in these calculations for Crediton.

Firstly, given the district wide total is likely to increase; it is likely this figure will need to be revised upwards.

Irrespective of the overall total changing, we believe the capacity of identified sites in Crediton is less than the 298 units quoted, (and which would leave a balance of sites for 500 dwellings to be found), and is closer to 200, (which would leave a higher balance of sites for nearly 600 dwellings required). In this case, the balance of additional sites required to make up the overall total of 800 units will need to be increased. As a result it would be necessary to find additional land for development in the town. Our clients land ownership at Pedlerspool would make an important contribution to meeting this requirement. This requirement will be increased further in the event that the overall requirement increases further once the updated SHMA is published.

Draft Policy S4 – Meeting Housing Needs

Draft Policy S4 Criterion A sets out the overall level of housing growth which should be delivered across the Plan period with a total of 8,400 dwellings needing to be provided at a rate of 420 dwellings per annum. Criterion B of the Policy sets out the overall approach to Affordable Housing to be delivered subject to Viability.

Observations on Draft Policy S4

As mentioned in our comments on Draft Policy S3 it appears the proposed total of 8,400 homes is not based on any up to date evidence, and that with the publication of the next version of the SHMA for the area expected over the next couple of months, it is likely the total requirement will need to be revised upwards. Our client therefore OBJECTS to this Draft Policy on the basis that the current total is not robust, and if carried forward would be unsound.

Suggested Amendments to Draft Policy S4

Given the above we suggest that the overall total of 8,400 homes be revised to reflect up to date evidence as and when this becomes available.

Draft Policy S13 – Crediton

Draft Policy S13 seeks to promote Crediton as a 'small and vibrant market town'. The Draft Policy goes on to state that the strategy for the town 'aims to improve access to housing within the town, expand employment opportunities and improve the quality of existing retail provision'.

We note the supporting text to this Draft Policy, notably paragraphs 2.57 to 2.59 make reference to Crediton's important role within the surrounding area. However, due to various constraints the text then notes that there was 'an under provision of development Allocation' in the town in the existing Development Plan but this was justified as lower growth in the town was offset by overprovision in other parts of the district.

Observations on Draft Policy S13

Our client SUPPORTS the general objectives for the town which seek to ensure its continuing role as an important centre within the local hinterland, and which recognise the need to improve access to housing and expand employment opportunities.

In relation to the growth options proposed, our clients SUPPORT the principle of a higher growth option for the town and therefore Crediton Option 1 is the preferred scenario. However, in our clients' view the levels of residential growth required under Option 1 are likely to be higher than the 800 dwellings currently proposed for the following reasons:

- There is a strong likelihood that the overall district total will be increased, (see our comments in respect of Draft Policy S3). This suggests that there will be a need to make a proportional increase to the level of growth proposed for Crediton.
- It has already been accepted by the Council that Crediton has suffered from an under provision of development in the current Development Plan. Whilst this might have been justified at the district-wide level because of over provision in other locations, such under provision does not assist the Council in achieving its stated objectives for the town, and which seek to ensure its continuing role as an important and vibrant centre with improved access to housing and jobs. Addressing the current and future shortfalls can only be achieved by a robust allocation of land, probably in excess of the current 800 dwellings/5,300 square metre commercial levels. It is accepted that the area around Crediton is subject to

a range of physical constraints, and it is therefore necessary to explore availability to their full potential of sites which are able to accommodate development, especially where they would provide both housing and commercial space, such as Pedlerspool.

Suggested Amendments to Draft Policy S13

Our clients suggest that the higher growth option (Option 1) be adopted as the approach towards development in Crediton. However, this support is on the basis that should the level of overall growth need to be increased, for example in relation to the evidence provided by an updated SHMA, then the figure currently set for Option 1 will be increased accordingly.

Draft Policy CRE6 – Pedlerspool

Draft Policy CRE6 identifies the Pedlerspool site as a possible Allocation for mixed use development capable of providing 165 dwellings and 2,100 square metres of commercial floor space, as well as land for use by the local Rugby Club as a relocation site and various green infrastructure improvements.

On behalf of the land owners of the Pedlerspool site I confirm that it is available and deliverable for development.

Observations on Draft Policy CRE6

Our clients strongly SUPPORT the inclusion of the Pedlerspool site as one of the proposed growth sites in Crediton. There are very many considerable merits associated with this site.

- The site has the potential to deliver in a single scheme a substantial amount of the future growth required for Crediton. The importance of this fact will be given increased emphasis in the event that headline growth levels for the town increase as a result of revised district-wide targets.
- The merits of the scheme have already been subject to considerable scrutiny as a result of the examination into the existing Site Allocations DPD. Having tested the site the Inspector concluded (see pages 30 and 31 of his Report), that it was entirely suitable for development and for 195 houses rather than the 165 currently proposed in Draft Policy CRE6. The only reason the site was presented as a contingency rather than a full Allocation was on the basis of a perceived lack of immediate need. Given there is now an express need to identify further sites, especially with the prospect of increased overall targets, then there must be considerable merit in now identifying the Pedlerspool site for development. Whilst we note that a minority of the local community have expressed concerns about the potential landscaping impact of development in this location previously, the Inspector concluded that sufficient protection could be secured as part of any scheme to address this potential concern, and believed there were no other constraints to the site coming forward for development, hence its Contingency Allocation.
- Allocation of the Pedlerspool site should be made in preference to other untested and more distant Greenfield sites which are suggested in the Draft Local Plan. For

example, the proposed sites at Chapel Down Farm (CRE11) and Westwood Farm (CRE10) are both located on exposed sites on the extreme western edge of Crediton and are therefore remote from the town centre, unlikely to come forward due to deliverability and viability issues, and remote from major employment areas. Whilst Allocation of these areas may be considered given the need to deliver growth in the town, they are manifestly in unsustainable locations. By contrast the Pedlerspool site has already been shown to be capable of delivering a large amount of housing, commercial and recreational uses in a location which is within easy access of both the town centre and other employment areas. This will only be improved with the Lords Meadow Industrial Estate link road which is already nearing completion.

Suggested Amendment to Draft Policy CRE6

Draft Policy CRE6 should be amended to confirm that the land at Pedlerspool will be Allocated for development. The level of housing proposed could be increased to that considered previously, i.e. to 195 dwellings, albeit that opportunities may exist for this level to be increased further.

Criterion G of the Policy CRE6 should be amended, as as drafted is too restrictive and is an unnecessary and impractical barrier to delivery of much needed housing.

Criterion H as stated in paragraph 3.93 (there is a typographical error here in the Mid-Devon document), should no longer be required given the completion of the link road is now imminent.

The Pedlerspool site is the only credible option for relocation of the Crediton Rugby Club. The land owners have a dialogue with Crediton Rugby Club, who it is understood are still interested in exploring options for relocation and delivering a potential relocation solution for the future.

James Gibbs MRICS
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17th March 2014

Nick Cardnell

Subject: FW: Local Plan Review - Policy CRE7

Importance: High

From: Debbie Lander [<mailto:dlander@jackson-stops.co.uk>]

Sent: 20 March 2014 13:22

To: DPD

Cc: James Gibbs

Subject: Local Plan Review - Policy CRE7

Dictated by and sent on behalf of James Gibbs:

Dear Sirs

Local Plan Review – Policy CRE7

Following recent Representations made in respect of the Local Plan Review and Policy CRE7 on behalf of our clients the Turner family; I write to confirm further updated information.

It is understood that the Crediton Rugby Club Executive Board have recently met and confirmed their desire to find a relocation site and a need to future-proof the Rugby Club.

It is also understood they will be making separate Representations to Mid Devon in this regard, and we believe they will be supportive of land at Pedlarspool (CRE6) coming forward as a Mixed Use Scheme, which will include for the provision of an alternative relocated Rugby Club site.

Kind regards.

Yours sincerely

James Gibbs MRICS
Director – Development Land & New Homes
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